

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Stephanie E. Hauck
Dorsey M. Hauck Jr. a/k/a Dorsey M. Hauck
Debtor(s)

Nationstar Mortgage LLC
Movant

v.

Stephanie E. Hauck
Dorsey M. Hauck Jr. a/k/a Dorsey M. Hauck
Debtor(s)

and

Jack N. Zaharopoulos
Trustee

BK. NO. 23-00076 MJC

CHAPTER 13

MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Date: June 06, 2023

/s/ Brian Nicholas
Brian Nicholas, Esquire
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Stephanie E. Hauck
Dorsey M. Hauck Jr. a/k/a Dorsey M. Hauck
Debtor(s)**

CHAPTER 13

**Nationstar Mortgage LLC
vs.
Movant**

NO. 23-00076 MJC

**Stephanie E. Hauck
Dorsey M. Hauck Jr. a/k/a Dorsey M. Hauck
Debtor(s)**

**Jack N. Zaharopoulos
Trustee**

11 U.S.C. Section 362

**MOTION OF Nationstar Mortgage LLC
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is Nationstar Mortgage LLC.
2. Debtor(s) is/are the owner(s) of the premises 253 Mainzer Hill Road, Danville, PA 17821, hereinafter referred to as the mortgaged premises.
3. Jack N. Zaharopoulos is the Trustee appointed by the Court.
4. Movant is the holder of a mortgage, original principal amount of \$105,000.00 on the mortgaged premises that was executed on March 27, 2017. The mortgage has been assigned as follows:
Assigned to Nationstar Mortgage LLC on March 29, 2023, recorded on April 4, 2023 in Northumberland County, Instrument Number 202304586.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$874.29 for the months of April 2023 through May 2023.
7. The total amount necessary to reinstate the loan post-petition is \$1,748.58.
8. The total amount necessary to payoff the loan is \$106,881.95.
9. Movant is entitled to relief from the automatic stay for cause pursuant to 11 U.S.C. § 362(d).

10. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

11. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgaged premises.

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